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May 24, 2013

Magistrate A. Kathleen Tomlinson
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Thomas M. Moroughan v. The County of Suffolk, et al.
Docket No.: CV-12-0512

Dear Magistrate Tomlinson:

This office is counsel to plaintiff, Thomas M. Moroughan (Moroughan) and I submit this letter to the Court on Mr. Grandinettes behalf, seeking an extension of time to file a response to Suffolk County's Motion to Quash (DE 87) beyond the three business day limit set forth in Your Honor's Individual Practice Rules.

On May 22, 2013 the County of Suffolk filed a Motion to Quash (DE 87) plaintiff's subpoena commanding the disclosure of all documents from the Suffolk County District Attorney's Office related to the arrest and criminal investigation of plaintiff. Mr. Grandinette is currently out of the country and will not return until May 31, 2013.

As Mr. Grandinette is out of the country and unable to file a response within three days, I spoke this morning to Assistant Suffolk County District Attorney Anne E. Oh, Esq. and obtained verbal consent to extend plaintiff's time to file a response to Suffolk's Motion to Quash .

I therefore respectfully submit this request for an extension of time within which to respond to Suffolk's Motion to Quash until June 5, 2013, three business days after Mr. Grandinette's return from abroad.

Respectfully submitted

Bryan A. Zuckerman, Esq.

cc: County of Suffolk Office of the County Attorney
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